

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

TERA A. McMILLAN)	
Plaintiff)	
)	
v.)	Civil Action No: 2:07-cv-00001-WKW
)	
ALABAMA DEPARTMENT OF YOUTH SERVICES, et al.,)	(JURY DEMAND)
Defendants)	

Plaintiff's List of Proposed Trial Exhibits

Comes now the Plaintiff, by and through undersigned counsel, and submits this list of proposed exhibits in this matter.

Exhibit

- 1 McMillian appointment letter dated October 22, 2002
- 2 Notes of Investigative Findings by Debra Spann dated June 14, 2005
- 3 Spann Meeting Notes
- 4 EEOC Charge of Discrimination, 7/12/05
- 5 Memorandum from Debra Spann, DYS Personnel Manager, to J. Walter Wood Jr., dated July 19, 2005.
- 6 Memorandum from Tim Davis, Deputy Director to J. Walter Wood, November 3, 2005.
- 7 Letter from J. Walter Wood to Michael Hardy, November 4, 2005
- 8 November 15, 2005 Hearing Transcript
- 9 Marcia Calendar Memo to J. Walter Wood, 12/8/05
- 10 Letter from J. Walter Wood Jr. to Michael Hardy, January 6, 2006.
- 11 Statement of Facts for State Personnel Hearing
- 12 Administrative Law Judge Recommended Order dated August 1, 2007.

- 13 Hardy Retaliation Documents. 6/21/05; 7/14/05
- 14 EEOC Charge, 12/11/05
- 15 EEOC Dismissal and Notice of Rights
- 16 Staton Interview of McMillian, Feb 16, 2006
- 17 Staton Report re: EEOC Charge, 3/31/06
- 18 Staton Interview of McMillian, December 1, 2006
- 19 Staton Investigative Summary, 02/27/2007
- 20 Rosters of employees attending training 2005-2007
- 21 Internal Memos/Reports at ITU re: McMillian
- 22 Transcription of Sylvesta Lee's tape recordings
- 23 Table of ITU Employee Sign In/Out Times, March-April 2006 with supporting Time & Attendance Reports
- 24 Security Gate Log of employees entering and leaving
- 25 Daily Time & Attendance Report 06/11/05-02/17/06
- 26 McMillian Performance Evaluations, 2002-2007
- 27 Lee's Letter to McMillian, December 6, 2005
- 28 Lee's Contact with Staff memo Jan 20, 2006 re: Insubordination
- 29 Lee's Memo re: Mandatory A Training 2006
- 30 Hardy Memo re: Sex Discrimination, 1/18/00
- 31 Defendant's Response to Requests for Admissions

Additionally, the plaintiff may utilize and offer into evidence any materials necessary for evidentiary foundation or rebuttal purposes and/or any materials designated by the defendant as potential exhibits in the trial of this matter.

Respectfully submitted this 13th day of February 2008.

/S/ JIMMY JACOBS

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using CM/ECF system and service will be perfected upon counsel of record following this the 13^h of February, 2008.

/s/**Jimmy Jacobs**

JIMMY JACOBS (JAC051)

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